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2010 OCT 13 AM 11:30

OFFICE OF GENERAL
COUNSEL

4 October 2010

mur 6382

Mr. Jeff S. Jordan, Esq.
Office of General Counsel
Federal Election Commission
999 E. Street N.W.
Washington, D.C. 20463

Re: Len Britton Campaign

Dear Mr. Jordan:

Enclosed please find a Response submitted on behalf of the Len Britton for Vermont Campaign in the above-referenced cause.

Sincerely yours,

JJW

John J. Welch, Jr., Esq.

JJW/tab

Enc.

Cc: Mr. Jon Readnour, Esq., w/enc.

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FEDERAL ELECTION COMMISSION

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OFFICE OF GENERAL
COUNSEL

CASTLE MANAGEMENT GROUP, LLC,
Complainant

MUR #: 6382

v.

LEN BRITTON FOR VERMONT,
Respondent

RESPONSE

The Respondent, Len Britton for Vermont Campaign respectfully responds as follows to the Complaint in this cause as follows:

I.

Said Complaint contains allegations that are, respectfully submitted, wholly non-meritorious.

Complainant and Dan Riley were as of the late winter and certainly early spring of 2010 patently in breach of an agreement entered into as between them and the "Campaign" wherein Castle Management Group LLC and specifically its principal, Mr. Riley were to have undertaken to serve as Campaign Manager as regards the affairs and doings of the campaign. Implicit within the four corners of said agreement was the understanding that any and all managerial duties in respect of the same would be undertaken prudently and competently.

Instead, such duties were undertaken imprudently and incompetently to such an extent that the Campaign in respect of its electoral efforts was accordingly suffering notably and needlessly.

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Mr. Riley clearly understood at the outset that his remuneration would obviously be contingent on receipt on the part of the Campaign of satisfactory funding. He, himself undertook to oversee doings in such respects. Such an undertaking amounted to the equivalent of an abysmal failure as of late winter and early spring, 2010.

Mr. Riley moreover engaged in doings classically deleterious to the Campaign's efforts; doings such as issuing an endorsement of a candidate for statewide office in the midst of a primary with absolutely no authority to have done so whatsoever.

Mr. Riley moreover made misleading statements to Mr. Britton about the then existence of a fund raising letter to have been authored by Mr. Riley.

Mr. Riley and the Campaign finally parted company as of early April, 2010.

Please see: the enclosed five (5) page Exhibit "A" evidencing just some of the breaches on Mr. Riley's part that led to his departure circa April 3rd, 2010.

II.

In view of the foregoing recitations, clearly there is no way that \$44,196.17 has ever been due and owing to the Complainant. In fact, respectfully submitted, in light of the same, the amount of \$16,577.54 is perhaps undoubtedly reflective of a generous concession to Complainant on the part of the Campaign.

III.

1. Exhibit "B" affixed hereto is a copy of a payment schedule originally agreed to by Complainant.

2. Exhibit "C" affixed hereto is a copy of Complainant's statement showing monies paid through April 27th, 2010 by the Campaign to Complainant totaling \$10,250.00.

3. Checks were moreover issued on April 29th, 2010 for \$500.00; May 6th, 2010 for \$500.00 and May 27th, 2010 for \$500.00.

4. The abovesaid amounts total up to the sum of \$11,750.00.

IV.

With reference to Exhibit "B", Mr. Riley (Castle Management Group LLC) was to have been paid \$1,800.00 per week, to wit: \$12,000.00 for involvement with the Campaign from November 10th, 2009 through February 14th, 2010. Mr. Riley (Castle Management Group LLC) was to have been paid \$2,000.00 per week, to wit: \$14,000.00 for involvement with the Campaign from February 14th, 2010 through the first week of April, 2010. He (Castle Management Group LLC) would have been moreover arguably entitled to four (4) weeks of severance pay but for the aforesaid breach on his part, to wit, a total of another \$8,000.00 covering the period of the last three (3) weeks of April and the first week of May, 2010.

Reduction of \$12,000.00 plus \$14,000.00 being \$26,000.00 by the sum of \$11,750.00 (\$10,250.00 plus \$1,500.00) results in an amount having been arguably due of only \$14,250.00 as of the first week of April, 2010. Giving Mr. Riley (Castle Management Group LLC) the benefit of ~~some~~ doubt as respects his claimed expenses serves to arguably warrant consideration of an amount due him (Castle Management Group LLC) of however no more than \$16,577.34.

V.

In conclusion, it is expected that the matter of what is claimed due by Complainant may well become the subject of civil litigation initiated by them. Any such action will be

vigorously defended with reference to the incompetence, imprudence and patent breaches
on Complainant's part.

DATED this 4th day of October, 2010 at Rutland, Vermont.



John J. Welch, Jr., Esq.

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From: "Daniel T. Riley" <driley@lenbritton.com>
Subject: **PRESS RELEASE: BRITTON FIGHTS IN SENATE - BRITTON VOWS TO REPEAL GOVERNMENT TAKEOVER OF HEALTHCARE**

Date: March 22, 2010 11:24:28 AM EDT

To: "Daniel T. Riley" <driley@lenbritton.com>

► 1 Attachment, 188 KB

- Common Sense Leadership for Tomorrow -

News Release

For Immediate Release

Contact: Daniel Riley, Campaign Manager, (802) 681-3765

BRITTON VOWS TO REPEAL GOVERNMENT TAKEOVER OF HEALTHCARE

(Woodstock, VT - 3/22/10) Yesterday House Democrats in Washington passed a reconciliation bill that is another step toward the government takeover of healthcare that the Obama administration has been struggling with for over a year.

"While this bill has some positive merits, it was passed after overwhelming public opposition which increased dramatically due to political deals and backroom maneuvering in Washington. Let's be clear about the content of this bill - it will increase individual premiums 10% to 13%, increase taxes by \$569.2 billion, cut Medicare by \$523 billion, and cuts Social Security revenues and Medicare cuts twice - once to pay future Social Security and Medicare benefits and keep the programs solvent and a second time to fund new benefits in the health care bill."

"This bill nearly triples the penalty on Vermont's small businesses that cannot afford to provide their workers with health coverage, and applies these taxes to part-time as well as full-time workers. Businesses are going to incur additional overhead making it more difficult to create new jobs."

"This legislation will cost Vermont jobs, take more income out of people's pockets, and dramatically increases the size of government. If elected - I will fight to repeal this flawed legislation and work to provide a healthcare plan Americans will have confidence in, fosters our economy, and focuses on quality at an affordable price" said Britton.

Len Britton is the independent Republican candidate for the United States Senate focused on changing "business as usual" politics in Washington D.C. Britton is campaigning on a platform of jobs, national security, and economic reform. He has also pledged term limits and not to accept special interest contributions. Further press information and updates can be found at the campaign website www.lenbritton.com.

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Daniel T. Riley
Campaign Manager
driley@lenbritton.com
(802) 681-3765 cell
<<http://www.lenbritton.com/>>

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Exhibit "C"



Jeffrey D. Bartley

Checks sent to Dan campaign-to-date (4/27/2010)

Taylor, Charles <Charles.Taylor@citizensbank.com>

Tue, Apr 27, 2010 at 11:31 AM

To: jbartley@lenbritton.com, "Jeffrey D. Bartley"

The following checks have been sent to Castle Management, LLC out of the campaign account:

1. 1/22/2010 Check #1008 for \$500.00 (Cleared 2/2/2010)
2. 2/8/2010 Check #1014 for \$1,000.00 (Cleared 2/12/2010)
3. 2/17/2010 Check #1017 for \$500.00 (Cleared 2/25/2010)
4. 2/23/2010 Check #1020 for \$1,000.00 (Cleared 3/1/2010)
5. 3/5/2010 Check #1024 for \$2,000.00 (Cleared 3/11/2010)
6. 3/16/2010 Check #1033 for \$1,800.00 (Cleared 3/25/2010)
7. 3/26/2010 Check #1040 for \$500.00 (Cleared 4/2/2010)
8. 4/1/2010 Check #1047 for \$700.00 (Cleared 4/6/2010)
9. 4/8/2010 Check #1050 for \$500.00 (Cleared 4/14/2010)
10. 4/15/2010 Check #1057 for \$1,000.00 (Cleared 4/22/2010)
11. 4/22/2010 Check #1062 for \$1,000.00 (Outstanding)

To date (4/27/2010), Castle Management has been paid \$10,200.00

Charles Taylor, Treasurer, Len Britton for Vermont, LLC

Use of email is inherently insecure. Confidential information, including account information, and personally identifiable information, should not be transmitted via email, or email attachment. In no event shall Citizens or any of its affiliates accept any responsibility for the loss, use or misuse of any information including confidential information, which is sent to Citizens or its affiliates via email, or email attachment. Citizens does not guarantee the accuracy of any email or email attachment, that an email will be received by Citizens or that Citizens will respond to any email. This email message is confidential and/or privileged. It is to be used by the intended recipient only. Use of the information contained in this email by anyone other than the intended recipient is strictly prohibited. If you have received this message in error, please notify the sender immediately and promptly destroy any record of this email.

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